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Attorneys for defendant  
DAVID CAMPOY

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

UNITED STATES OF AMERICA,	)	No. CR 20-0458 BLF
	)	
Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER CONTINUING STATUS</b>
vs.	)	<b>CONFERENCE DATE FROM</b>
	)	<b>DECEMBER 7, 2021 TO FEBRUARY</b>
DAVID CAMPOY, et al	)	<b>22, 2022</b>
	)	
	)	
Defendants.	)	
	)	
	)	

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1. This matter is set for a status hearing on December 7 at 9:00 AM. The 23-count Second Superseding Indictment charges fifteen defendants with a variety of drug trafficking and firearms offenses. The case involves a substantial volume of discovery, including multiple wiretaps.

2. The government has been producing discovery on a rolling basis. A substantial production was made to the joint discovery coordinator and that material was made available to defense counsel on September 21. The government has recently provided pole camera surveillance footage, consisting of approximately four terabytes of data to the group discovery coordinator. That material is in the process of being distributed to defense counsel. A continuance will allow the parties time to review the substantial volume of discovery.

3. The parties stipulate that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendants in a speedy trial, given the need for effective preparation of counsel.

For the above reasons, the parties respectfully request that the date of December 7, 2021 be vacated, and that the matter be re-set for a status conference on February 22, 2022.

**IT IS SO STIPULATED.**

DATED:

\_\_\_\_\_/s/\_\_\_\_\_  
ALEXANDRA SHEPARD  
Assistant United States Attorney

DATED

\_\_\_\_\_/s/\_\_\_\_\_  
Peter A. Leeming  
Attorneys for David Campoy

DATED:

\_\_\_\_\_/s/\_\_\_\_\_  
EDWARD AJLOUNY  
Counsel for Defendant Jose Campoy

DATED:

\_\_\_\_\_/s/\_\_\_\_\_  
DOUGLAS RAPPAPORT  
Counsel for Defendant David Greenman

1 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
2 SEVERA KEITH  
3 Counsel for Defendant Kimberly Carrasco

4 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
5 DAVID PLOTSKY  
6 Counsel for Defendant Miguel Carrizal  
7 Zamora

8 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
9 RICHARD WEESE,  
10 Counsel for Defendant Jose Rodriguez  
11 Naranjo

12 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
13 NAOMI CHUNG  
14 Counsel for Defendant Nicholas Ardanuy

15 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
16 JERRY FONG  
17 Counsel for Defendant Ignacio Espinoza

18 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
19 ROBERT CAREY  
20 Counsel for Defendant Juan Johel Padilla

21 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
22 ALFREDO MORALES  
23 Counsel for Defendant Luis Sendino

24 DATED: \_\_\_\_\_/s/\_\_\_\_\_  
25 ROBERT LYONS  
Counsel for Defendant Michael Osuna  
Guizar

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID CAMPOY, et al,

Defendants.

) No. 20 CR-0458 BLF  
)  
) **[PROPOSED] ORDER**  
) **CONTINUING STATUS**  
) **CONFERENCE DATE**  
)  
)  
)  
)  
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)  
)

The time between December 7, 2021 and February 22, 2022 is excluded from the Speedy Trial Act due to the need for defense investigation and effective preparation of counsel. Furthermore, the Court finds that the ends of justice served by granting the requested continuance outweigh the best interest of the public and the defendant in a speedy trial. The Court therefore concludes that this exclusion of time should be made under 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(iv).

Dated: \_\_\_\_\_

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